

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ANTHONY PAUWELS, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

BIT DIGITAL, INC., MIN HU, and ERKE
HUANG,

Defendants.

Case No. 1:21-cv-00515-ALC

CLASS ACTION

ZHONGXUN YANG, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

BIT DIGITAL, INC., MIN HU, and ERKE
HUANG,

Defendants.

Case No. 1:21-cv-00721-ALC

CLASS ACTION

JOSEPH FRANKLIN MONKAM NITCHEU,
individually and on behalf of all others similarly
situated,

Plaintiff,

v.

BIT DIGITAL, INC., MIN HU, and ERKE
HUANG,

Defendants.

Case No. 1:21-cv-02262-ALC

CLASS ACTION

**SUPPLEMENTAL DECLARATION OF JEFFREY C. BLOCK IN FURTHER SUPPORT
OF JOSEPH FRANKLIN MONKAM NITCHEU’S MOTION FOR APPOINTMENT AS
LEAD PLAINTIFF**

I, Jeffrey C. Block, declare, under penalty of perjury:

1. In March of this year, attorneys from my firm had discussions with a potential class member who was interested in filing a lawsuit against Bit Digital that would include as class members those who purchased shares on January 11, 2021. We expected this person to file such a case, but ultimately, the person elected not to do so. At the same time, an attorney from my office obtained a certification from Mr. Nitcheu which was signed electronically on March 9, 2021.

2. Once we understood that a new case would not be filed by the other individual, an attorney from my firm obtained a revised certification from Mr. Nitcheu, which was signed electronically on March 11, 2021. We then began preparing a complaint in Mr. Nitcheu's name to extend the class period to January 11, 2021.

3. The attorney who had been interacting with Mr. Nitcheu had an unexpected, emergency absence on March 16, 2021, which caused a different attorney from my office to file Mr. Nitcheu's complaint. That attorney inadvertently filed the older March 9 certification, rather than the newer March 11 certification, with the complaint.

4. No one from my firm realized that the certification filed with Mr. Nitcheu's complaint was the earlier March 9, 2021 certification, or that the March 11, 2021 certification filed with Mr. Nitcheu's lead plaintiff motion was different from the one filed with Mr. Nitcheu's complaint, until April 5, 2021.

5. Attached as Exhibit A is a list of copied and pasted headlines from marketwatch.com reflecting all press releases issued during the 60-day PSLRA lead plaintiff window related to Bit Digital.

Executed on April 12, 2021 at Boston, Massachusetts.

/s/ Jeffrey C. Block

Jeffrey C. Block

CERTIFICATE OF SERVICE

I hereby certify that on April 12, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a Notice of Electronic Filing to all counsel of record.

/s/ Jeffrey C. Block
Jeffrey C. Block